

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

X

ALYSA OCASIO, ANDREW OCASIO, and  
JAHAIRA HOLDER, as Administratrix of the Estate  
of Sandy Guardiola,

Plaintiffs,

- against -

The CITY OF CANANDAIGUA, a municipal entity;  
Canandaigua Police Chief STEPHEN HEDWORTH,  
in his individual and official capacities; Canandaigua  
Police Sergeant SCOTT KADIEN, in his individual  
capacity; DOCCS Regional Director GRANT  
SCRIVEN, in his individual capacity; DOCCS Parole  
Chief DAWN ANDERSON, in her individual  
capacity; DOCCS Senior Parole Officer THOMAS  
O'CONNOR, in his individual capacity; DOCCS  
Senior Parole Officer BETH HART-BADER, in her  
individual capacity,

Defendants.

No. 18-cv-06712 (MAV)(MWP)

X

**NOTICE OF PLAINTIFFS' MOTION FOR SANCTIONS**

Motion By:

Alysa Ocasio, Andrew Ocasio, and Jahaira  
Holder, as Administratrix of the Estate of  
Sandy Guardiola

Time and Place of Hearing:

**ORAL ARGUMENT REQUESTED:**  
January 15, 2025, at 2:00 p.m. before the  
Honorable Colleen Holland,  
United States District Court for Western  
District of New York, located at the United  
States Courthouse, 100 State Street, Rochester,  
New York 14614.

Relief Demanded:

Sanctions, attorneys' fees, and for other relief  
under Fed. R. Civ. P. 26 and 37

Supporting Papers:

Memorandum of Law dated December 31,  
2024; Affirmation of Marc Cannan in Support  
of Motion dated December 31, 2024, and  
accompanying exhibits. Plaintiffs intend to file  
a Reply Memorandum of Law.

Opposition Papers:

Opposing papers must be served not less than 14 calendar days after service of the motion pursuant to Rule 7.1(b)(2) of the Local Rules for the United States District Court for Western District of New York.

Dated: New York, New York  
December 31, 2024

Respectfully submitted,  
BELDOCK LEVINE & HOFFMAN LLP

By: /s/Marc A. Cannan  
Jonathan C. Moore  
Luna Droubi  
Marc A. Cannan  
Marc Arena  
M. Olivia Clark

*Attorneys for Plaintiffs*